

January 15, 1999

This document was submitted to EPA by a registrant in connection with EPA's evaluation of this chemical, and it is presented here exactly as submitted.

December 14, 1998

Ms. Marcia Mulkey (7501C)
U.S. Environmental Protection Agency
Office of Pesticide Programs
401 M Street, SW
Washington DC 20460

Subject: **Response to receipt of Preliminary Environmental Fate and Effects
Division (EFED) Chapter of the Reregistration Eligibility Decision (RED)
Document for Azinphos-methyl and request for comments within 15 days,
List A Case 0235**

Dear Ms. Mulkey,

On November 30, 1998, BAYER received a copy of the Preliminary Environmental Fate and Effects Division (EFED) Chapter of the Reregistration Eligibility Decision (RED) Document for Azinphos-methyl. In the letter attached to this copy, Ms. Kathy Monk, Reregistration Branch II Chief requested that we respond to receiving this copy with comments on errors, confidential business information and planned data **within 15 days of receipt**. BAYER is working hard to analyze the documents provided and prepare a response, however, we will be unable to reply within the 15 days requested. In accordance with the guidance put forward by Mr. Fred Hansen at the Agency's TRAC meeting this summer for release and review of Preliminary Risk Assessments for Organophosphates, BAYER will respond by December 30, 1998, which is 30 days from the day we received it. This follows that guidance which we have received for all other similar documents received from the Agency thus far for other active ingredients, and will allow for a complete and careful review of the data for this important agricultural tool.

Additionally, we understand that our counterparts at Mahkteshim-Agan have not yet received a copy of this chapter from the EPA. Since they are primary registrants of azinphos-methyl also, the Agency will need to allow for their response prior to taking further action as well.

If you have any comments on this response, feel free to call me at (816) 242-2255.

BAYER CORPORATION
Agriculture Division

John S. Thornton
Director, Product Registrations and Regulatory Affairs

cc: Ms. Kathy Monk, Mr. Barry O'Keefe – *EPA/SRRD*
 Mr. Jay Vroom - *ACPA*